

Daniel Eli, Esq., State Bar No. 192019  
Eve S. Senuty, Esq., State Bar No. 239605  
**BLACK, COMPEAN, HALL & ELI**  
A Limited Liability Partnership  
700 South Flower Street, Ste. 3350  
Los Angeles, California 90017  
Telephone: (213) 629-9500  
Facsimile: (213) 629-4868

Attorneys for Plaintiff and Counterdefendant  
St. Paul Surplus Lines Insurance Company

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ST. PAUL SURPLUS LINES ) Case No. C 10-05567 MEJ  
INSURANCE COMPANY, a Delaware )  
Corporation, ) **STIPULATION TO CONTINUE**  
Plaintiff, ) **DEADLINES AND CASE**  
 ) **MANAGEMENT CONFERENCE;**  
 ) **[PROPOSED] ORDER THEREON**

vs. )

CLIPPER SQUARE, LLC, et al., ) [USDC ND Local Rules 6-1, 6-2]  
 )  
Defendants. )

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CLIPPER SQUARE, LLC, et al., )  
 )  
Counter-Claimants )

vs. )

ST. PAUL SURPLUS LINES )  
INSURANCE COMPANY, et al., )  
 )  
Defendants [sic] )

**RECITALS**

**WHEREAS**, deadlines and hearings are pending in this action pursuant to the Courts December 8, 2010 Order Setting Initial Case Management Conference and ADR Deadlines, as well as the Northern District's Local Rules and Federal Rules of Civil Procedure;

**WHEREAS**, on January 31, 2011, Defendants Clipper Square, LLC, Clipper Square, Inc., Philip Richardson, Laurence O. Mathews, Ronald M. Katz, and KMR Properties, LLC (collectively, "Counterclaimants") filed an Answer, Third Party Complaint and Counterclaim naming Plaintiff St. Paul Surplus Lines Insurance Company ("St. Paul") as a Counterdefendant.

**WHEREAS**, Counterclaimants have not served their Third Party Complaint as against any of the Third Party Defendants named therein.

**WHEREAS**, the St. Paul and Counterclaimants are engaged in settlement negotiations, and anticipate either reaching a settlement of St. Paul's action against all defendants along with Counter Claimants' claims against third party defendants, or reaching an impasse, at which time some or all of this case will be ready to proceed in the ordinary course.

**WHEREAS**, pursuant to a concurrently filed stipulation, St. Paul's responsive pleading to the Counterclaim is due on or before March 28, 2011. The deadline for Defendants Stacy Thal, R. Samuel Klatchko, Helmut Haas, Susan Harding, Bruno Ledwin, Richard Ledwin, Robert Pin, Mukhtiar Sajjan, and Rajvir Shoker (collectively "Defendants") to respond to St. Paul's Amended Complaint is March 14, 2011, pursuant to the extension granted by St. Paul in a Stipulation filed with the court.

**WHEREAS**, the status of hearings and deadlines currently pending is as follows:

2/24/11 L/D to file ADR Certification signed by parties and counsel

L/D to file either Stipulation to ADR Process or Notice of Need

1 for ADR Phone Conference

2 L/D for parties to meet and confer re initial disclosures, early  
3 settlement, ADR process selection, and discovery plan (hold  
4 Rule 26(f) conference)

5  
6 3/10/11 L/D to file Rule 26(f) Report (including Discovery Plan)

7 L/D to complete/file initial disclosures, or state objections in  
8 Rule 26(f) Report

9 L/D to file CMC Statement

10 L/D to file consent or objection to Magistrate

11  
12 3/17/11 Case Management Conference

13  
14 **STIPULATION**

15 IT IS HEREBY STIPULATED, by and between the parties, that the dates set  
16 forth in the Court's December 8, 2010 Order Setting Initial Case Management  
17 Conference and ADR Deadlines are continued as follows:

18 (a) The February 24, 2011 deadline with respect to the following  
19 deadlines is continued to March 28, 2011:

20 (1) To file ADR Certification signed by parties and counsel

21 (2) To file either Stipulation to ADR Process or Notice of  
22 Need for ADR Phone Conference

23 (3) For parties to meet and confer re initial disclosures, early  
24 settlement, ADR process selection, and discovery plan  
25 (hold Rule 26(f) conference)

26 (b) The March 10, 2011 deadline with respect to the following  
27 deadlines is continued to April 11, 2011:

28 (1) To file Rule 26(f) Report (including Discovery Plan)

(2) To complete/file initial disclosures, or state objections in Rule 26(f) Report

(3) To file CMC Statement

(4) To file consent or objection to Magistrate

(c) The March 17, 2011 hearing date for the Case Management Conference is continued at least 29 days to April ~~15~~, 2011, or to a date convenient for the court.

14

**IT IS SO STIPULATED**

Dated: February 24, 2011 **BLACK, COMPEAN, HALL & ELI, LLP**

By


  
Daniel Eli

Eve S. Senuty

Attorneys for Plaintiff and Counterdefendant  
St. Paul Surplus Lines Insurance Company

Dated: February 24, 2011 **BRANSON, BRINKOP, GRIFFITH & STRONG, LLP**

By

  
John H. Podesta

Attorneys for Defendants and Counterclaimants  
Clipper Square, LLC, Clipper Square, Inc., Philip  
Richardson, Laurence O. Mathews, Ronald M. Katz,  
and KMR Properties, LLC

Dated: February \_\_\_\_\_, 2011 **CHAPMAN & INTRIERI, LLP**

By

\_\_\_\_\_  
Spencer Edgett

Attorneys for Defendants Stacy Thal, R. Samuel  
Klatchko, Helmut Haas, Susan Harding, Bruno  
Ledwin, Richard Ledwin, Robert Pin, Mukhtiar  
Sajjan, and Rajvir Shoker

(2) To complete/file initial disclosures, or state objections in Rule 26(f) Report

(3) To file CMC Statement

(4) To file consent or objection to Magistrate

(c) The March 17, 2011 hearing date for the Case Management Conference is continued at least 29 days to April 15, 2011, or to a date convenient for the court.

14

**IT IS SO STIPULATED**

Dated: February \_\_\_\_, 2011 **BLACK, COMPEAN, HALL & ELI, LLP**

By

Daniel Eli

Eve S. Senuty

Attorneys for Plaintiff and Counterdefendant  
St. Paul Surplus Lines Insurance Company

Dated: February \_\_\_\_, 2011 **BRANSON, BRINKOP, GRIFFITH & STRONG, LLP**

By

John H. Podesta

Attorneys for Defendants and Counterclaimants  
Clipper Square, LLC, Clipper Square, Inc., Philip  
Richardson, Laurence O. Mathews, Ronald M. Katz,  
and KMR Properties, LLC

Dated: February 24, 2011 **CHAPMAN & INTRIERI, LLP**

By

Spencer Edgett

Attorneys for Defendants Stacy Thal, R. Samuel  
Klatchko, Helmut Haas, Susan Harding, Bruno  
Ledwin, Richard Ledwin, Robert Pin, Mukhtiar  
Sajjan, and Rajvir Shoker

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: February 25, 2011

  
\_\_\_\_\_  
Chief Magistrate Judge Maria-Elena James



**PROOF OF SERVICE****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I, Patti A. Diroff, am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 700 South Flower Street, Suite 3350, Los Angeles, California 90017.

On February 24, 2011, I served the foregoing document described as:  
**STIPULATION TO CONTINUE DEADLINES AND CASE MANAGEMENT  
 CONFERENCE; [PROPOSED] ORDER THEREON** on all interested parties in  
 this action, as follows:

☒ BY MAIL *as to those parties so designated*. True copies thereof were placed in sealed envelopes addressed as stated on the attached mailing list:

☐ \*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

☒ As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under the practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage date is more than 1 day after date of deposit for mailing in affidavit.

☒ BY EFILING SERVICE, *as to those parties so designated*. The above document(s) were electronically filed and served pursuant to Local Rule 5-4 and General Order 45, which provide that upon electronic filing, a Notice of Electronic Filing (NEF) is automatically generated by the CM/ECF system and sent by e-mail to the attorneys registered as CM/ECF Users and who have consented to electronic service. Service by NEF constitutes service pursuant to the Federal Rules of Civil and Criminal Procedure for all attorneys who have consented to electronic service. As to those attorneys not registered for the CM/ECF system or who did not consent to electronic service, and as to those documents excluded from electronic filing, all such services are effected through traditional means of service in the manner prescribed in the Federal Rules of Civil Procedure and the Local Rules.

☒ Federal) I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 24, 2011, at Los Angeles, California.

  
Patti A. Diroff



**SERVICE LIST**

St. Paul Surplus Lines v. Clipper Square, et al.  
USDC Case No. C 10-05567 MEJ

**Served via Efiling**

John H. Podesta, Esq.  
David P. McDonough, Esq.  
Branson Brinkop Griffith & Strong LLP  
643 Bair Island Road, Suite 400  
Redwood City, CA 94063  
(650) 365.7710, FAX: 650.365.7981  
Email: dmcdonough@bbgslaw.com

Attorneys for Defendants and  
Counterclaimants Clipper Square, LLC,  
Clipper Square, Inc., Philip Richardson,  
Laurence O. Mathews, Ronald M. Katz,  
and KMR Properties, LLC

**Served via US Mail**

J. Spencer Edgett, Esq.  
Chapman & Intrieri, LLP  
2236 Mariner Square Drive, Suite 300  
Alameda, CA 94501  
(510) 864-3600, FAX (510) 864-3601  
sedgett@chapmanandintrieri.com

Attorneys for Defendants Stacy Thal, R.  
Samuel Klatchko, Helmut Haas, Susan  
Harding, Bruno Ledwin, Richard  
Ledwin, Robert Pin, Mukhtiar Sajjan,  
and Rajvir Shoker